IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	6:16cr8(3)
	§	Chief Judge Ron Clark
QUANNELL NEWTON a/k/a: "Ty";		

ELEMENTS OF THE OFFENSE

You are charged in Count One of the indictment with a violation of 18 U.S.C. § 1201(c), Conspiracy to Commit Kidnapping.

The essential elements which must be proven to establish the violation are:

1. That you knowingly conspired and agreed with others to seize or kidnap the victim;
2. That the victim was held for ransom, reward, or for some other reason;
3. In committing or in furtherance of the commission of the offense, the victim was transported in interstate or foreign commerce;
4. That the defendant acted unlawfully, knowingly and willfully;

Respectfully submitted,

BRIT FEATHERSTON
ACTING U.S. ATTORNEY

/s/ Paul A. Hable
PAUL A. HABLE
Assistant United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was delivered by electronic delivery to defendant's attorney, Tab Lawhorn, 7TH day of November, 2016.

/s/ Paul A. Hable
PAUL A. HABLE